## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE:

LUZ CARMARIE RODRIGUEZ FIGUEROA

**DEBTOR** 

CASE NO. 19-05439/MCF CHAPTER 13

## DEBTOR'S MOTION REQUESTING ORDER RE: AUTHORIZATION TO USE FUNDS FROM 2020 TAX REFUND

TO THE HONORABLE COURT:

**NOW COMES, LUZ CARMARIE RODRIGUEZ FIGUEROA,** the Debtor through the undersigned attorney, and very respectfully states and prays as follows:

- The Debtor's confirmed Plan dated November 8, 2019, provides that Debtor's tax refunds will be paid into the Plan. See docket #14.
- 2. The Debtor has received her 2020 tax refund in the amount of \$1,220.00. Attached is copy of bank e-statement, which reflects the direct deposit of the 2020 tax refund on March 2, 2021, issued by the Puerto Rico Treasury Department.
- 3. The Debtor respectfully submits to the Court that she needs to use these funds to pay for: new washing machine Debtor's (actual washing machine is broken), car repair expense and arrears on utility bill.
- 4. The Debtor needs to use the funds from the 2020 "tax refund" to pay for these reasonable expenses. Furthermore, the Debtor is living within a very "tight" budget which barely covers his living expenses and a Plan payment of \$150.00.
- 5. Based on the above-stated, the Debtor respectfully requests this Court to Order the authorization of the use of these funds for this expense.

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WHEREFORE, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion and allow the use of the funds from the 2020 tax refund by the Debtor to pay for the above-stated expense.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to the Debtor, Luz Carmarie Rodriguez Figueroa, to the address of record: Bo Palo Seco Buzon 207, Maunabo PR 00707.

**RESPECTFULLY SUBMITTED**. In San Juan, Puerto Rico, this 16 th days of March 2021.

/s/ Roberto Figueroa Carrasquillo

USDC #203614 RFIGUEROA CARRASQUILLO LAW OFFICE PSC ATTORNEY FOR PETITIONER PO BOX 186 CAGUAS PR 00726 TEL 787-744-7699 /787-963-7699 Email: rfc@rfigueroalaw.com

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Nombre Dirección <i>Marca</i>	Ed M	Año_	Tablilla	
CANT.	ARTICULOS	A	PRECIO	
	Bin part 1975			
L MOMENTO DE F ARANTÍAS <b>NO</b> SO IEZAS ELÉCTRIC	TOS PODRAN SER CORREGIDOS RECOGER LA MERCANCIA. ON TRANSFERIBLES. AS NO TIENEN GARANTÍA.	Sub-total IVU +		
SPECIALES NO T	MENTE DESPACHADAS Y PEDIDOS IENEN DEVOLUCIONES, AS VENCEN A LOS 30 DÍAS	TOTAL		

	Estimado	de Mueblería Modelo	Precio
idad fuu	adva Whirlpool	WTW 5000 DW 3	799.00
		Ivu	91.89
			\$ 8 90.69
			1000



Cliente LUZ RODRIGUEZ FIGUEROA

Datos de la Cuenta

Clase de servicio: Residencial Diámetro del contador: 5/8\* Porción: 37 Días de consumo facturado: 32

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011392

LUZ RODRIGUEZ FIGUEROA 207 BO PALO SECO MAUNABO PR 00707-2926 Centro Servicio al Cliente | 787-860-2482 www.acueductospr.com

NÚMERO DE CUENTA: 00022777859 4
FECHA DE FACTURA: 02/24/2021
FECHA DE VENCIMIENTO: 03/17/2021
TOTAL A PAGAR: \$241.38
CANTIDAD ENVIADA: \$

Recuerden que también pueden realizar su pago, ya sea parcial o total, en cualquier localidad que acepten pagos de la AAA.



00022777 AS9 4 000002413A D

TALON DE PAGO - DESPRENDA POR ESTA PERFORACION -

## PRIMERA FACTURA

Período de consumo hasta: 02/19/2021 NÚMERO DE FACTURA: 203550913531 CLIENTE: LUZ RODRIGUEZ FIGUEROA DIRECCIÓN: 207 CARR 759

NÚMERO DE CUENTA: 00022777859 4 FECHA DE FACTURA: 02/24/2021 FECHA DE VENCIMIENTO: 03/17/2021

MAUNABO PR 00707

RESUMEN DE CARGOS CORRIENTES

CARGOS POR AGUA: \$75.01
CARGOS POR ALCANTARILLADO: \$0.00
CARGO FIJO: \$0.00

\*CAR: \$31.50
\*\*CARGO ESPECIAL: \$2.00
TOTAL CARGOS CORRIENTES: \$108.51

\* Cumplimiento Ambiental y Regulatorio / \*\* Gestión Sostenible

El cargo corriente de este mes refleja la mitad del consumo en metros cúblicos en el período. Es mes, su factura incluye la primera mitad del cargo \$108.51, y la factura del mes siguiente incluirá otra mitad, \$108.51. El Total a Pagar de esta factura incluye la primera mitad del cargo, y ademá puede incluir ajustes, cualquier batance vencido u otras transacciones financieras del período.

Contador Fecha Lect. Anterior	Fecha/Lock	Actual Co	onsumo Consu	mo Facturado
2112541 12/18/2020 3101	02/19/2021	3179 78	m3 L	39 m3

L Significa Consumo por Lectura Real

Un metro cúbico equivale a 264.11458 galones / Su consumo en galones es 10,300.47

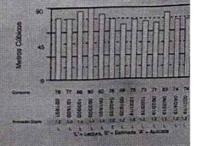
Esta factura presenta un balance vencido, el cual debe pagarse en o antes de la fecha de vencimiento o el servicio podrá ser suspendido. No obstante, si los cargos vencidos incluyen facturas de más de 50 días, el servicio puede estar suspendido o podrá ser suspendido en cualquier momento.

CARC	os/	CR	ÉDIT	os	IMP	O	RT	E	
									l

Balance Actual

\$800.90

Concepts	Сопыли	Costo	Total
Carren transe	10.00		10.60
Section 1	5.00	Mark Comment	623
logue 2	18.00	1.00	19.90
Vocum 5	10.00	2,60	1000
Section 4	4.00	2.84	11.36
TOTAL	39.00		minima seleti



TOTAL A PAGAR:

GUIA PARA OBJECTON DE CARGOS: POR DISPUSADO DE RAS MAYOR INFORMACION NOU HAVE SO DADE SAN FORMACIONED SERVICE MAY BE SUSPENDED AFTERTHIE DUE DATE FOR BURNET FOR CONSCITUDIANE NOT FOLLOWED, SERVICE MAY BE SUSPENDED AFTERTHIE DUE DATE FOR BURNET FOR CONSCITUDIANE NOT FOLLOWED, SERVICE MAY BE SUSPENDED AFTERTHIE DUE DATE FOR BURNET FOR CONSCITUDIANE NOT FOLLOWED.

COLMADO EL SANTOS ON 02/28/21	
- \$5.88	03/01/2021
Capitulo 13 AOR Capitulo 1	
- \$150.00	03/01/2021
DEPT DE HACIENDA REINTEGROS	
+ \$1,220.00	03/02/2021
ATH MOVIL 9093	
- \$10.00	03/02/2021
TRIPLE-S VIDA TRIPLE-S V	
- \$20.00	03/02/2021